

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

THE UNITED STATES for the use of)
GMW Fire Protection, Inc., an Alaska)
Corporation,)

Plaintiff,)

vs.)

KANAG'IQ CONSTRUCTION CO.,)
INC., an Alaska Corporation, and)
WESTERN SURETY COMPANY, a)
South Dakota Corporation,)

Defendants.)

Case No. A05-170 CI (TMB)

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Defendants, KANAG'IQ CONSTRUCTION CO., INC. and WESTERN SURETY COMPANY ("Kanag'iq"), through their counsel, Eide & Gingras, P.C., propose the following areas of questions for voir dire, based on the assumption that the Court has its own standard questions with respect to citizenship, ability to speak the English language, knowledge of witnesses, lawyers, membership in organizations, and the like. Assuming that the Court has such standard questions, Kanag'iq intends to inquire on the following subjects:

1. Military service, past or present.
2. The jurors' views on tort reform.
3. Hobbies, movies, bumper stickers, books read recently, special interests,

and the like.

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1 4. Experience with contracts in any form, including, but not limited to,
2 construction contracts, remodeling contracts, contracts for the sale or purchase of
3 automobiles, and the like.

4 5. Experience with any claim or dispute involving contracts.

5 6. Experience with bonding companies versus insurance companies and an
6 appreciation of the difference.

7 7. If justified by the evidence, the prospective jurors' feelings about awarding
8 significant damages.

10 8. Employment experience in either the insurance or bonding industry.

11 9. Experience in bookkeeping/accounting.

12 10. Experience in business management.

13 11. Experience in the construction industry.

14 DATED at Anchorage, Alaska this 2nd day of January 2008.

16 EIDE & GINGRAS, P.C.
17 Attorneys for Defendants
18 Kanag'iq Construction Co., Inc.
And Western Surety Company

19 By: s/Thomas S. Gingras
20 Thomas S. Gingras
21 425 G Street, Suite 930
22 Anchorage, AK 99501
23 Phone: (907) 279-0930
24 Fax: (907) 279-0933
25 E-mail: tsgingras@egpalaska.com
Alaska Bar No. 7811098

Eide & Gingras, P.C.
425 G Street, Suite 930
Anchorage, Alaska 99501
(907) 279-0930 telephone
(907) 279-0933 fax

CERTIFICATE OF SERVICE

I am a legal secretary employed by the law
firm of Eide & Gingras, P.C. That on this
2nd day of January 2008, I served

☒ Electronically

a true and accurate copy of the foregoing
document upon the following counsel of record:

Sarah J. Tugman, Esq.
2509 Eide Street, Suite 4
Anchorage, AK 99503

EIDE & GINGRAS, P.C.

By /s/Donna Charter

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Eide & Gingras, P.C.
425 G Street, Suite 930
Anchorage, Alaska 99501
(907) 279-0930 telephone
(907) 279-0933 fax

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